

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

JIA SHENG,

Plaintiff,

v.

No. 12 Civ. 01103 (HBS)

DEFENDANTS' WITNESS LIST

M&T BANK CORPORATION, and
MANUFACTURERS & TRADERS
TRUST COMPANY, d/b/a M&T
BANK,

Defendants.

Defendants, M&T Bank Corporation and Manufacturers & Traders Trust Company, d/b/a M&T Bank (collectively "Defendants" or "M&T"), by their attorney, Sean D. Ronan, Esq., pursuant to the Court's scheduling order, submits the following list of witnesses he may call at the trial of this matter:

DEFENDANTS' WITNESS LIST

1. Dhana Hannibal (fact)
5422 Village Station Circle
Williamsville, NY 14221

Ms. Hannibal, Assistant Vice President and Senior Employee Relations Specialist of M&T Bank, will/is expected to testify about her interactions with Plaintiff including Plaintiff's request for an accommodation to her AWA arrangement, the determination that her request could not be reasonably accommodated and the various options that were made available to Plaintiff.

2. Monica K. Holcomb (fact)
61 Steinfeldt Road
Lancaster, NY 14086

Ms. Holcomb, Vice President and Systems Manager I of M&T Bank, will/is expected to testify about her interactions with Plaintiff with regard to work related matters and with regard to the changes being made to Plaintiff's alternative work arrangement. Ms. Holcomb will also testify about the new initiative in their department that necessitated the change to Plaintiff's alternative work arrangement, and about the determination that Plaintiff's request could not be reasonably accommodated.

3. David R. Lee (fact)
36 Huntington Court
Williamsville, NY 14221

Mr. Lee, Vice President and Systems Manager II of M&T Bank, will/is expected to testify about the new initiative for M&T that necessitated the change to alternative work arrangements – including Plaintiff's. Mr. Lee will also testify about the review of Plaintiff's request for an accommodation, the business needs related to the new initiative, and the determination that Plaintiff's request could not be reasonably accommodated.

4. Melissa Thompson (fact)
514 Main Street - #403
Buffalo, NY 14203

Ms. Thompson, Vice President and Employee Relations Corporate Programs Manager of M&T Bank, will/is expected to testify about M&T's policies with regard to employee requests for accommodations, and the review and determination regarding Plaintiff's request. Ms. Thompson will also testify about M&T's policies with regard to alternative work arrangements. She will also testify about the various options that were offered to Plaintiff, including the offer of severance.

5. Sean D. Ronan (fact)
5 Fox Chapel Court
Williamsville, NY 14221

Mr. Ronan, Vice President and Senior Counsel of M&T Bank, will/is expected to testify about the unconditional offer of continued employment in October 2012 (while Plaintiff was still an employee), and about the further unconditional offers of employment made thereafter. Mr. Ronan will not testify as to any matters covered by attorney-client privilege, and Defendants expressly reserve all rights with respect to any attorney-client privileged communications.

6. Martha D'Arcangelo
730 Starin Avenue
Tonawanda, NY 14223

Ms. D'Arcangelo, Vice President and Employee Relations Legal Services Manager of M&T Bank, will/is expected to testify about the unconditional nature of the offers of employment extended to Plaintiff since October 2012.

7. John Walp, Jr.
5855 Locust Street Ext
Lockport, NY 14094

Mr. Walp, Administrative Vice President and Corporate Information Security Officer, will/is expected to testify about M&T Bank's policies and procedures regarding the retention, collection and production of electronic data, including emails, on M&T's information systems.

Dated: October 3, 2014
Buffalo, New York

M&T BANK
Sean D. Ronan, Esq.
Thomas K. Frederick, Esq.
Attorneys for Defendants

By: /s/Sean D. Ronan
Sean D. Ronan

One M&T Plaza
Buffalo, New York 14203
Telephone: (716) 842-5401
sronan@mtb.com
tfrederick@mtb.com